

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

AMERICAN ASSOCIATION OF UNIVERSITY  
PROFESSORS, ET AL.,

Plaintiffs,

v.

MARCO RUBIO, ET AL.,

Defendants.

Case No. 1:25-cv-10685 (WGY)

**PLAINTIFFS' ADDENDUM TO MOTION TO COMPEL COMPLETE ANSWERS TO  
PLAINTIFFS' INTERROGATORIES, PRODUCTION OF DOCUMENTS, AND  
DISCLOSURE OF INFORMATION IMPROPERLY WITHHELD AS PRIVILEGED**

Plaintiffs file this brief addendum to their Motion to Compel that was filed yesterday, June 24, 2025, in order to inform the Court of additional highly relevant information that is missing from Defendants' document productions and that Plaintiffs first learned about during yesterday's deposition of Stuart Wilson, a State Department official. Mr. Wilson, the Deputy Assistant Secretary in charge of the Visa Office in the Bureau of Consular Affairs, testified that:

- [REDACTED]
- [REDACTED]
- [REDACTED]

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<sup>1</sup> Protecting the United States from Foreign Terrorists and Other National Security and Public Safety Threats ("E.O. 14161"), The White House (Jan. 20, 2025), <https://perma.cc/TJ33-ET28>; Additional Measures to Combat Anti-Semitism ("E.O. 14188"), The White House (Jan. 29, 2025), <https://perma.cc/7XT9-QHXY>.

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[REDACTED] Plaintiffs' counsel made clear on the record that these documents must be produced immediately and that if not, Plaintiffs would need to move to compel. [REDACTED]

[REDACTED] However, counsel for the government could not agree to do so, stating that documents have to go through a multi-stage, time-consuming privilege review before they can be produced. But here, even if there were a colorable claim of privilege as to any of these documents, they should have been provided to the Court for *in camera* review. They have not been. *See* ECF No. 131.

Plaintiffs respectfully request that the Court order Defendants to produce these documents, in addition to the documents identified in Plaintiffs' Motion to Compel.

June 25, 2025

Respectfully submitted,

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David Zimmer (BBO 692715)

/s/ Scott Wilkens  
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Ramya Krishnan

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**CERTIFICATE OF SERVICE**

I hereby certify that on June 25, 2025, I filed Plaintiffs' Addendum to Motion to Compel Complete Answers to Plaintiffs' Interrogatories, Production of Documents, and Disclosure of Information Improperly Withheld as Privileged, and that service will be accomplished by the CM/ECF system.

June 25, 2025

/s/ Scott Wilkens

Scott Wilkens

*Counsel for Plaintiffs*